

EXHIBIT G

Richard Chakejian, et al. v. Equifax Information Services, LLC, et al. 07-2211, et al.

Lewis Perling, Esq. August 18, 2009

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RICHARD CHAKEJIAN,)
)
Plaintiff,)
) CIVIL ACTION FILE
vs.)
) NO. 07-2211
EQUIFAX INFORMATION SERVICES,)
LLC,)
)
Defendant.)

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

BRUCE SUMMERFIELD,)
)
Plaintiff,)
) CIVIL ACTION FILE
vs.)
) NO. 08-1450
EQUIFAX INFORMATION SERVICES,)
LLC,)
)
Defendant.)

VIDEOTAPED DEPOSITION OF LEWIS PERLING, ESQ.

AUGUST 18, 2009

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7 Was I notified somehow that there was a
8 challenge that the language that you and I read
9 violated the Fair Credit Reporting Act?

10 Q. Correct.

11 A. I don't recall any, but I don't believe to
12 my recollection that there was ever a challenge to
13 these letters.

14 Q. Prior to the cases that we are here today
15 on?

16 A. Certainly no consumer, to my knowledge, had
17 ever contacted Equifax and said that they were misled
18 somehow by these letters or by any letter. From my
19 recollection, I don't recall a consumer ever saying,
20 hey, your letter is misleading; but I have never been
21 put on notice of any challenge to a letter by Equifax.

22 I mean, I know you claim in these two cases
23 that there is a challenge to the legality of them and,
24 as you know, I represent Equifax and I would disagree
25 with that position; but I'm not aware of any consumer

1 ever contacting Equifax and saying that they were
2 misled, you know, by some language in a letter.

3 Q. Are you aware of any lawsuits contending
4 that these letters violated the FCRA, other than the
5 two that we are talking about here today?

6 A. You are talking about prior to these two
7 cases being filed, am I aware of any other cases prior
8 to these two where there was a challenge to the or to
9 a letter?

10 Q. This letter.

11 A. And again, this letter, you are talking
12 about just that language that we looked at?

13 Q. Yes.

14 A. No. Certainly not. I'm not aware of any
15 consumer that ever contacted Equifax or sued Equifax
16 and contended that this letter was misleading, the
17 language we looked at.